

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDAL RICHARDSON, et al.)	
)	
Defendants.)	

**PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST
REQUEST FOR PRODUCTION**

Comes now Plaintiff David Stebbins, who hereby serves the defendants with his response to their request for production.

1. Copies of your federal tax returns for the fiscal years of 2006, 2007, 2008, 2009, and 2010.

Answer: I object to this question on the grounds that my federal income tax returns are confidential and are, therefore, legally privileged. In any event, I don't have them. The years of 2006 and 2007 were the only years where I filled out my own federal income tax returns, and I have long since discarded them. For the years of 2008 through 2010, my parents did my taxes for me, claiming me as their dependent, and combining my tax filings with their own.

2. All documents identified in your answers to Defendants' Interrogatories to Plaintiff.

Answer: Since only one interrogatory (the sixteenth interrogatory) was answered, rather than objected to, and that interrogatory did not require any documentation, then this

interrogatory is not applicable.

3. A copy of your resume submitted to Defendants or to any employment service agency prior to June 1, 2007.

Answer: No resumes were submitted to any employment agency prior to June 1, 2007, which leaves only the resume submitted to the Defendants. I object to that, on the grounds that the Defendant already possesses this document, and, in any event, I no longer have a copy of it.

4. All documents which support the special damages and lost earnings which you claim in this action.

Answer: I object to this request on the grounds that it is vague and burdensome. It is unclear, specifically, what documents you are requesting of me. If you are simply requesting any document that could potentially fall into this category, that is overly burdensome. I will cooperate with a request for production if you state with detail the documents you requested, provided that the information you requested is otherwise discoverable.

5. All documents that contain information about, refer or relate to your hiring or termination of employment with Reliable Heat & Air, LLC.

Answer: Again with the “all documents” bullcrap. This is unduly oppressive. Am I supposed to just do a keyword search all over my hard drive and print out everything that I get? What about all those threads that I created on legal message boards to help me do this pro se? I will produce documents that are otherwise discoverable if, and only if, you are clear and unambiguous in what documents you want, and that these documents are narrowly defined. State specifically, *exactly* what documents you want from me.

6. All medical records, reports or information related to your “Asperger Syndrome” as alleged in your complaint.

Answer: I object to this question on the grounds that it has already been provided when I served the defense attorney with my 26(a) initial disclosures.

7. All documents attached to plaintiff's complaint because the copies received by Defendants were not clearly photocopied and were not legible.

Answer: I object to this request because it is vague and burdensome. What, exactly, was not “clearly photocopied?” Why can't the court clerk provide a clearer copy at the defendant's request? If I could see a good rendition of the documents that the Defendant received along with my complaint, I may be able to realize where the Defendants are coming from and clear up the confusion. As it stands, however, I am the one who is confused as to what the defendants want.

That is my response to the Defendants' First Request for Production.



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